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Attorneys for Defendants Chiang Fang Chi-yi; Chiang Tsai Hui-mei; Chiang Yu-sung; Chiang Yo-lan; Chiang Yo-bo; Chiang Yo-chang; Chiang Yo-ching



UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

THE BOARD OF TRUSTEES OF THE LELAND STANFORD JUNIOR UNIVERSITY,

Plaintiff,

VS.

CHIANG FANG CHI-YI, an individual; CHIANG YO-MEI, an individual; CHIANG HSIAO-CHANG, an individual; CHIANG TSAI HUI-MEI, an individual; CHIANG YU-SUNG, an individual; CHIANG YO-LAN, an individual; CHIANG YO-BO, an individual; CHIANG YO-CHANG, an individual; CHIANG YO-CHING, CHUNGYAN CHAN, an individual

Defendants.

CASE NO.: 13:cv-04383-EJD

[Honorable Edward J. Davila Courtroom 4]

STIPULATION TO EXTEND TIME FOR DEFENDANTS TO ANSWER OR OTHERWISE RESPOND TO AMENDED COMPLAINT 1

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WHEREAS the Complaint in the above-entitled action was filed on
September 20, 2013 in the U.S. District Court for the Northern District of
California;

WHEREAS, on January 14, 2014, Plaintiff served Defendants Chiang Fang-Chiyi, Chiang Yo-sung and Chiang Yo-bo with the Complaint via electronic mail pursuant to the Court's order of January 14, 2014;

WHEREAS, Defendants Chiang Fang-Chiyi, Chiang Yo-sung and Chiang Yo-bo's (hereinafter collectively referred to as "Served Defendants") response to the Complaint was due on February 4, 2014;

WHEREAS, Defendants Chian Tsai Hui-mei, Chiang Yo-lan, Chiang Yochang and Chiang Yo-ching (hereinafter collectively referred to as "Waiver Defendants") agreed to waive service of the Complaint;

WHEREAS, the Served Defendants and Waiver Defendants are represented by the same counsel;

WHEREAS, Plaintiff and Defendants previously filed a Stipulation To Extend Time For Defendants To Answer or Otherwise Respond To Complaint on February 3, 2014. With the stipulated extension, the Served Defendants and Waiver Defendants deadline to answer or otherwise respond to the Complaint was extended until April 14, 2014;

WHEREAS, Plaintiff filed an Amended Complaint on March 7, 2014;

WHEREAS, the deadline for the Served Defendants and Waiver Defendants to answer or otherwise respond to the Amended Complaint is March 28, 2014;

IT IS HEREBY STIPULATED AND AGREED, PURSUANT TO LOCAL RULE 6-1, that the deadline for Defendants Chiang Fang-Chiyi, Chiang Yo-sung, Chiang Yo-bo, Chiang Tsai Hui-mei, Chiang Yo-lan, Chiang Yo-chang and Chiang Yo-ching to answer or otherwise respond to the Amended Complaint is extended until April 14, 2014.

Case 5:13-cv-04383-BLF Document 31 Filed 03/20/14 Page 3 of 5 Dated: March 20, 2014 **VENABLE LLP** 1 2 By: /s/ Tamany Vinson Bentz Ben D. Whitwell 3 Tamany Vinson Bentz 4 Attorneys for Defendants 5 Chiang Fang Chi-yi; Chiang Tsai Hui-mei; Chiang Yu-sung; Chiang 6 Yo-lan; Chiang Yo-bo; Chiang Yo-7 chang; Chiang Yo-ching 8 Dated: March 20, 2014 PILLSBURY WINTHROP SHAW 9 PITTMAN LLP 10 11 By: /s/ Mark Davis Litvack 2049 CENTURY PARK EAST, SUITE 2100 LOS ANGELES, CA 90067 310-229-9900 Mark Davis Litvack 12 VENABLE LLP James Chang 13 Attorneys for Plaintiff The Board of Trustees of the Leland 14 Stanford Junior University 15 16 17 18 19 20 21 22 23 24 25 26 27 28

STIPULATION TO EXTEND TIME FOR DEFENDANTS TO ANSWER
AMENDED COMPLAINT
Case No.: 13-cv-04383-EJD

2049 CENTURY PARK EAST, SUITE 2100 LOS ANGELES, CA 90067 310-229-9900 VENABLE LLP

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SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing STIPULATION TO EXTEND TIME FOR DEFENDANTS TO ANSWER OR OTHERWISE RESPOND TO AMENDED COMPLAINT. In compliance with the General Order, I hereby attest that the other signatories to this filing have concurred in this filing.

Dated: March 20, 2014

By: /s/ Tamany Vinson Bentz Tamany Vinson Bentz Attorney for Defendants Chiang Fang Chi-yi; Chiang

Tsai Hui-mei; Chiang Yu-sung; Chiang Yo-lan; Chiang Yo-bo; Chiang Yo-chang; Chiang Yo-

ching

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I HEREBY CERTIFY that on this 20th day of March, 2014, a copy of the foregoing STIPULATION TO EXTEND TIME FOR DEFENDANTS TO ANSWER OR OTHERWISE RESPOND TO AMENDED COMPLAINT was served via CM/ECF:

CERTIFICATE OF SERVICE

Mark Davis Litvack James Chang

Pillsbury Winthrop Shaw Pittman LLP 725 South Figueroa Street, Suite 2800 Los Angeles, CA 90017-5406

Attorneys for Plaintiff The Board of Trustees of the Leland Stanford Junior University

By: /s/ Tamany Vinson Bentz

Attorney for Defendants Chiang Fang Chi-yi; Chiang Tsai Huimei; Chiang Yu-sung; Chiang Yo-lan; Chiang Yo-bo; Chiang Yo-chang; Chiang Yo-ching

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